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September 20, 2018

VIA EMAIL

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1701 South Blvd.
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Re: *Baronius Press, Ltd. v. Saint Benedict Press, LLC*
United States District Court, Western District of North Carolina
Case No. 3:16-cv-00695-GCM

Dear Jon,

I refer to your letter of August 29, 2018 regarding document designated Confidential – Attorney Eyes Only. In your letter you mentioned that:

If there are certain, specific, documents that you need to show your client that you would like us to redact, my client is willing to consider such a request, however, it is not willing to incur the hours of time and the associated expense to redact such information from all 300 plus pages of documents without some further explanation as to why undergoing such an expense would be necessary.

You are aware that we objected to this response and filed a Motion to Compel. There are certain documents that we would like to share with our client and subject to and without waiving the objections, we ask you to de-designate those documents to Confidential only.

To speeds things up, I have redacted what I am forecasting that Defendant would consider to be privileged information, and would ask you to review the attached pdf file. Please note that it is 1 of 7. If this sample is an example of what Defendant would agree to de-designate from AEO to Confidential, then I can also share with you files 2 through 7 for your consideration.

Please let me know your thoughts as soon as possible.



Respectfully submitted,

/s/ Mark W. Ishman

Mark W. Ishman, Esq.

Enclosures: Plaintiff's Proposed Redacted AEO Documents 1 of 7

cc: Kristin G. Garris (Garris@thsh.com)